

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

In re:	:	Chapter 11
	:	
EDWARD BYRON SLAUGHTER;	:	Case No. 13-42906
E. BYRON SLAUGHTER, LLC;	:	Case No. 13-42907
APEX LOCATORS, LLC;	:	Case No. 13-42908
CHAPEL HEIGHTS, LLC; and	:	Case No. 13-42909
ROLLING HILLS PLAZA, LLC,	:	Case No. 13-42910
	:	
Debtors.	:	Jointly Administered Under
	:	Case No. 13-42906BEM

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**APEX BANK'S RESPONSE IN OPPOSITION TO REORGANIZED DEBTOR'S  
MOTION TO REOPEN CASE AND REQUEST FOR HEARING**

Comes now Apex Bank, a secured creditor of E. Byron Slaughter, LLC, the Reorganized Debtor, and files this Response in Opposition to Reorganized Debtor's Motion to Reopen Case and Request for Hearing, requesting that before the Court rules on Reorganized Debtor's Motion to Reopen Case, a hearing be scheduled giving Apex Bank an opportunity to be heard on Reorganized Debtor's Motion to Reopen Case.

Wherefore, Apex Bank prays that Debtor's Motion to Reopen Case be denied, or in the alternative, that Apex Bank have an opportunity to appear before the Court in opposition to Debtor's Motion to Reopen Case.

BRINSON, ASKEW, BERRY,  
SEIGLER, RICHARDSON & DAVIS, LLP

BY: 

THOMAS D. RICHARDSON  
Georgia Bar No. 604313  
Attorney for Apex Bank

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**CERTIFICATE OF SERVICE**

I, THOMAS D. RICHARDSON, certify that I am over the age of 18 and that I have this day served a copy of the within and foregoing **Apex Bank's Response in Opposition to Reorganized Debtor's Motion to Reopen Case and Request for Hearing** by first class U. S. Mail, with adequate postage pre-paid on the following persons or entities at the addresses stated:


E. Byron Slaughter, LLC  
P.O. Box 858  
Rockmart, GA 30153

J. Nevin Smith, Esquire  
Smith Conerly LLP  
402 Newnan Street  
Carrollton, GA 30117

Martin P. Ochs, Esquire  
Office of the U.S. Trustee  
362 Richard Russell Bldg.  
75 Ted Turner Dr., SW  
Atlanta, GA 30303

This 23 day of July, 2019.

BRINSON, ASKEW, BERRY  
SEIGLER, RICHARDSON & DAVIS, LLP



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